

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

Alexander R. Glasgow,

Plaintiff

-vs-

General Electric Company

GE Renewable Energy,

Defendant(s)

CASE NO.

JUDGE

**JUDGE KNEPP**

**3:23 CV 1702**

**Parties Involved**

1. Alexander R. Glasgow  
205 Palmer Ln, Bryan, OH 43506
2. General Electric Company  
5 Necco St, Boston, MA 02210

**INITIAL COMPLAINT ALLEGES**

3. Plaintiff Alexander R. Glasgow is suing General Electric Company/GE Renewable Energy for discriminatory and retaliatory actions taken upon him for raising safety and religious discrimination concerns, ending in termination from Western Spirits wind farm. Subsequently GE then denied Alexander a second career opportunity near Haviland OH for not disclosing details on the active investigation of the discriminatory and retaliatory actions taken on him regarding his termination from his first career opportunity at Western Spirits.

### **JURISDICTION AND VENUE**

4. Plaintiff alleges but not limited to that GE Renewable Energy violated; Title VII of the Civil Rights Act of 1964, Title 18 section 241 and 242, First Amendment, USC 18 title 2331, The Occupational Health and Safety Act of 1970 section 11(c) and committed negligent misrepresentation.
5. Damages in excess of \$75,000 occurred in Bryan, OH Haviland, OH and near Moriarty, NM.
6. Plaintiff resides in Bryan, OH.
7. The charge of discrimination from the EEOC includes both career opportunities from New Mexico and Ohio that alleged crimes occurred.
8. Defendant GE operates all across the United States
9. Defendant GE has hired an attorney in Detroit, MI

### **COMPLAINT AND PERTINENT INFORMATION**

10. **December 1<sup>st</sup> 2021** plaintiff receives text from Benjamin Mondaca the site manager at Western Spirits stating "HR still open to work with us on your case" a few hours later plaintiff sends an extensive email with safety concerns regarding the covid 19 vaccine and concerns revolving religious discrimination. 10 days later after no further communication as Sarah Samyn from HR was on vacation, plaintiff was terminated.
11. **October 10<sup>th</sup> 2021** plaintiff had interview and passed the Technician Knowledge Assessment (TKA) 1 with an 80% and the TKA 2 with a 74%.
12. **October 11<sup>th</sup> 2021** plaintiff received the offer letter contract and signed the contract for a career opportunity at Wester Spirits wind farm.
13. **October 19<sup>th</sup>** defendant implements the unlawful Covid 19 EO 14042.
14. **18 U.S. code 2331 and Title 18 section 242/242** - This mandate issued by the Biden administration was not only deemed unlawful by the supreme court but plaintiff alleges that due to no completed clinical trials and the vaccines being under EUA/experimental there is no informed consent. Not only violating the Belmont report Nuremburg code and other informed consent laws but also an act of domestic terrorism for coercing employees of GE who are united states citizens into dangerous acts. Also coercing their employees participate in an unlawful mandate with no **Informed** consent. Furthermore, they acted under color of law to deprive plaintiff of his constitutional inalienable and unalienable rights.
15. Plaintiff believes in God over government. And that God will keep him safe and strong. Philippians 4:13 I can do all things through Christ which strengtheneth me.
16. **October 21<sup>st</sup> 2021** plaintiff receives notice of defendant was enforcing the unlawful EO 14042.
17. **November 2<sup>nd</sup>** plaintiff files for religious exemption.
18. **November 3<sup>rd</sup>** religious exemption denied. And a second exemption form submitted which was denied a few days later.
19. Plaintiff inquired as to why his forms were getting rejected and what he could do better. No communication from the defendant was offered regarding these inquires.

20. November 10<sup>th</sup> Plaintiff Submitted his 3<sup>rd</sup> exemption form. Was denied a few days later.
21. Plaintiff at this point had inquired multiple times as to why his accommodations were getting rejected. Again, no communication was offered to him from the defendant.
22. November 16<sup>th</sup> defendant's deadline for vaccine exemption was the 16<sup>th</sup>. Plaintiff had received confirmation from HR and the site manager that he could submit past the deadline. Plaintiff submitted and it was rejected for being past the deadline. GE later extended their deadline into January and no option to plaintiff was given to submit the accommodation that was rejected for being past the deadline again. Instead, he was told he cannot submit religious exemption anymore and he must get the vaccine or pursue medical exemption by Sarah Samyn.
23. **November 17<sup>th</sup>** plaintiff receives text from Ben Mondaca, the site manager of Western Spirits that everything was good except the plaintiffs exemption request.
24. This text in combination with the text from December 1<sup>st</sup> clearly illustrates retaliatory and discriminatory actions taken on him after raising safety and discrimination concerns. Especially after multiple inquiries as to why his exemption requests were getting denied and what he could do better multiple times, with no elaboration from the defendant as to why.
25. Plaintiff raises religious discrimination concerns. With no communication offered in return regarding these concerns from the defendant.
26. November 30<sup>th</sup> Plaintiff visited family practice doctor who was referring him to hematology for blood work for Plaintiff to pursue medical exemption.
27. **December 1<sup>st</sup> 2021** Plaintiff raises concerns revolving the medical exemption via having to pay doctor bills without insurance.
28. **December 1<sup>st</sup> 2021** Plaintiff receives text from Ben Monadaca asking when I could have the hematology results. Separately adding that HR is still willing to work with us on his case. A few hours later, plaintiff sends HR and the manager an extensive email with a plethora of safety and discrimination concerns, putting them on notice they are violating his rights.
29. December 9<sup>th</sup> Plaintiff received an email stating Sarah Samyn and Ben Mondaca scheduled a teams meeting to discuss plaintiffs "accommodation requests".
30. December 10<sup>th</sup> 2021 after no communication since Dec 1<sup>st</sup> other than the email about the accommodation request meeting, defendant terminates plaintiffs career opportunity via the "accommodation request" meeting with the only articulable reason is a comment based in religious nature off his first accommodation form submitted November 2<sup>nd</sup> 2021.
31. December 16<sup>th</sup> Plaintiff filed for an internal appeal with the defendant.
32. During the internal investigation, Naomi the corporate investigator approved Plaintiffs question on whether he could continue filing for other positions at the company. Also during the communications with Naomi, she stated in a phone call not to discuss details of the ongoing investigation as to not incriminate the plaintiff or another employee.

33. February 3<sup>rd</sup> 2022 Plaintiff had an interview with Jordon L Bott and Daniel Conley for a position in Haviland OH. During this interview plaintiff had mentioned that plaintiff passed the TKA 1 and TKA 2 for western spirits but plaintiff was no longer pursuing that job. Ultimately, they were offering plaintiff the position. Plaintiff was told he would be getting the offer letter the next day and the next day came around in which defendant called plaintiff a liar and rescinded the job offer. Plaintiff at the time could not get a clear answer as to why. Later in the position statement from the defendant to the EEOC defendant claimed plaintiff was disingenuous and lied about whose decision it was for plaintiff to not pursue the job at western spirits. Claiming the plaintiff said it was his decision not to take the job. When in reality this is a lie in itself. Plaintiff simply said he was no longer pursuing it and gave no indication as to whose decision it was. There was 2 active investigations on the job at western spirits, one with the EEOC and one internally with the defendant. In which plaintiff was not required to disclose details on nor was he asked to inquire further.
34. During the EEOCs investigation the defendant's attorney lied multiple times in their position statements.
35. Defendant's conduct was intentional, willful and taken in reckless disregard for the rights of Alexander R. Glasgow. Due to these actions, plaintiff received mental emotional and monetary damages.

### **PRAYERS FOR RELIEF**

WHEREFORE, the Plaintiff requests the Court ORDER that:

1. Declares that Defendant's conduct violated Title VII of the Civil Rights Act of 1964, Title 18 section 241 and 242, First Amendment, USC 18 title 2331, The Occupational Health and Safety Act of 1970 section 11(c), 42 U.S. code 12203 and committed negligent misrepresentation.
2. Awards appropriate monetary and punitive damages to Alexander R. Glasgow pursuant to 18 U.S. code 3571, 42 U.S. code 12188 and other relative remedies and procedures for violation of law.
3. Alexander R. Glasgow further requests such additional relief as the interests of the justice may require.

Dated: August 27<sup>th</sup> 2023

Respectfully submitted,

Alexander R. Glasgow – Pro Se  
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Phone: 734-735-6531  
Email: AlexGlasgow14@gmail.com

A handwritten signature in blue ink, appearing to read "Alex Glasgow", with a long horizontal flourish extending to the right.